



Joseph B. Burns
Direct Dial: (860) 493-3410
E-Mail: jburns@rms-law.com

One State Street Hartford, CT 06103
phone 860.549.1000 fax 860.724.3921
www.romemcguigan.com

February 25, 2021

VIA ECF

Judge I. Leo Glasser
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Zsa Zsa Jewels, Inc. v. BMW of North America, LLC et. al
Case No. 1:15-cv-06519-ILG-RLM

Dear Judge Glasser:

After consultation with Attorneys Philip Semprevivo and Joseph Kim, counsel for defendant BMW of North America, LLC ("**BMW N.A.**") the undersigned counsel for Plaintiff, Zsa Zsa Jewels Inc., submits this joint letter motion seeking a continuation of the current trial date of March 15, 2021, in the above referenced matter.

It is understood that, pursuant to Administrative Order Coronavirus/COVID-19 Pandemic No. 2020-26-2 issued on November 24, 2020, as amended by the Second Amendment of Administrative Order 2020-26 and Further Temporarily Suspending All In-Person Proceedings issued on January 14, 2021, all criminal and civil jury selections and trials have been postponed through March 1, 2021.

On February 24, 2021 the undersigned was advised by Case Manager Stanley Kessler that given the continued COVID-19 pandemic health concerns: the further postponement of in-person jury trials will be addressed by Chief District Judge Roslynn R. Mauskopf on or before March 1; that it is possible if not likely that Administrative Order 2020-26 may be extended beyond March 15, 2021; that, should Administrative Order 2020-26 be lifted on March 1 and in-person jury trials resume, criminal jury trials will be given precedence over the resumption of civil jury trials; and that, due to COVID-19 safety protocols limiting the number of court rooms available for jury trials upon resumption of in-person civil jury trials, the number of court rooms will be severely limited and the trial of this case will not be able to proceed as currently scheduled on March 15 in any event.

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Given these circumstances which are beyond the control of Your Honor or the parties, it is respectfully requested that the trial of this matter be continued to June 7 or 14, 2021 with the hope that the COVID-19 pandemic will have sufficiently subsided by that time to allow for the resumption of in-person civil jury trials. A commensurate extension of the Court's Civil Pretrial Order (Doc. 136) pretrial filing deadlines is also requested.¹

In the event that the Court's schedule and/or a continuation of COVID-19 safety protocols does not allow for a June 7 or June 14, 2021 trial date, the parties request a status conference with the Court for the selection of a new trial date.

Thank you for your consideration.

Sincerely,



Joseph B. Burns

JBB/exp

cc: Counsel of Record via ECF

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The application is granted. Jury selection and trial are adjourned to 6/7/2021 at 10:00 a.m. The pretrial conference is adjourned to 6/1/2021 at 2:30 p.m. So ordered.

____/s/ I. Leo Glasser____

2/26/2021

¹ In the event the Court sets a June 7, 2021 trial date, it is requested that compliance with the Civil Pretrial Order be extended to May 27, 2021, in order to accommodate counsel's current trial schedule in another matter.